

**AMERICA CARGO TRANSPORT, INC.**

16300 Christensen Rd, Suite 203, Seattle, WA 98188

January 17, 2006

VIA FAX

Director  
Commodity Procurement Policy &  
Analysis Division  
Farm Service Agency  
United States Department of  
Agriculture (USDA)  
Room 5755-S  
1400 Independence Avenue, SW  
Washington, DC 20250-0512

Attention: Mr. Richard Chavez

Re: 7 CFR Part 1496, Procurement of Commodities for Foreign Donation  
Proposed Rule

Dear Mr. Chavez:

America Cargo Transport, Inc. requests a formal extension of 45 days of the comment period on this Proposed Rule from the current deadline of January 17, 2006. We believe that this Proposed Rule raises a number of complex and important considerations that could affect U.S.-flag shipping and cargoes available to the U.S. flag as prescribed under applicable, longstanding cargo preference law and policy. We need additional time to consider and respond to the proposed rules.

We join with other carriers and the American Maritime Congress to urge you to convene a working session as soon as possible with U.S.-flag ship operating companies as well as other affected parties in the maritime industry for the purpose of learning more and exchanging ideas about how your office envisages that this Proposed Rule would work, potential savings, its effect on U.S.-flag liner and bulk carriers and compliance with the cargo preference laws, as well as the vital American seafaring jobs that go with them, and other issues.

We thank you for your consideration of these requests and look forward to hearing from you as soon as possible.

Sincerely,

A handwritten signature in cursive script, reading "Kevin P. Callahan", is written over a horizontal line.

Kevin P. Callahan  
General Counsel